

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,

Plaintiff,

v.

SKIPLAGGED, INC.,

Defendant.

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Civil Action No. 4:23-cv-00860-P

**PLAINTIFF AMERICAN AIRLINES, INC.'S EXHIBIT LIST
AND DEPOSITION TESTIMONY DESIGNATIONS**

Pursuant to the Court's Order [Dkt. No. 269 at 2] and Rule 26.2 of the Local Civil Rules for the Northern District of Texas, Plaintiff American Airlines, Inc. ("American") files this Exhibit List and Deposition Testimony Designations. Defendant Skiplagged, Inc.'s objections are listed next to the relevant exhibit or deposition testimony designation.

This Exhibit List and Deposition Testimony Designations is submitted without prejudice to American's right to amend this list, to the extent allowed by this Court and the law, or introduce at trial any additional evidence from any source either as rebuttal evidence or impeachment material or in the event new or different information becomes available. Additionally, American reserves the right to amend this list based on the progress of the case at trial. American also reserves the right to use any exhibit or deposition designation that Skiplagged designates.

I. EXHIBIT LIST

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX1	Certified Copy of Trademark Reg. No. 4449061	√			
PX2	Certified Copy of Trademark Reg. No. 4939082	√			
PX3	Certified Copy of Trademark Reg. No. 5288639	√			
PX4	Certified Copy of Trademark Reg. No. 5279167	√			
PX5	Certified Copy of Trademark Reg. No. 5559145	√			
PX6	Certified Copy of Copyright Registration No. VA 2-130-520		Never produced to Skiplagged. Fed. R. Civ. P. 37(c)(1); JMC Constr. LP v. Modular Space Corp., No. 3:07-CV-01925-B, 2008 WL 11425650, at *3 (N.D. Tex. Oct. 28, 2008).		
PX7	American Brand Recognition Report (AA-SKP-00059957–60078)	√			
PX8	American Airlines, Inc. Form 10-K Annual Report for Year Ending December 31, 2018 (AA-SKP-00054857–5105)	√			
PX9	Addendum to GTAA (2023-05-01) (AA-SKP-00052623–36)	√			
PX10	Addendum to the Governing Travel Agency Agreements (2017-06-23) (AA-SKP-00059877–87)	√			
PX11	American Conditions of Carriage (AA-SKP-00054065–85)		Irrelevant because it does not relate to AA's trademarks or copyright and		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			would confuse the jury. FRE 401, 403.		
PX12	American Airlines Conditions of Carriage as updated 2/4/2020 (AA-SKP-00053445–64)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX13	Email chain between M. Crossey and A. Comber dated 8/26/2015 re: skiplagged.com (AA-SKP-00103696–99)	√			
PX14	Email chain between L. Manning and J. Kettunen dated 11/30/2023 re: Skyscanner AUTH White-Labels.xlsx and Spreadsheet (AA-SKP-00103689–95)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. The exhibit is incomplete as it does not include multiple documents included in the email chain as attachments. FRE 106.		
PX15	Skyscanner Affiliate Partner Service Terms (April 27, 2022) (SKP00111207–25)	√			
PX16	Fare, Schedule and Inventory Access and Use Agreement between American and Skyscanner, dated February 15, 2016 (AA-SKP-00065397–418)	√			
PX17	Access and Use Agreement between American and Skyscanner, dated October 1, 2008 (AA-SKP-00065833–45)	√			
PX18	Fare, Schedule and Inventory Access and Use Agreement between American and	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
	Skyscanner, dated January 19, 2010 (AA-SKP-00065820–32)				
PX19	American Airlines, Inc. NDC Connection Use and Access Agreement for Non-Accredited Travel Intermediaries, dated August 15, 2019 (AA-SKP-00065370–96)	√			
PX20	Marketing Fulfillment Agreement between Exploretrip, Inc. and Skiplagged dated April 12, 2022 (SKP00111101–10)	√			
PX21	Kiwi.com Affiliate Program Agreement (SKP00111111–37)	√			
PX22	Spreadsheet of Kiwi Commissions (Kiwi.com_01061)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802.		
PX23	Holmes Test Buy No. 2 (AA-SKP-00058923–56)	√			
PX24	Holmes Test Buy No. 3 (AA-SKP-00059008–59)	√			
PX25	Holmes Test Buy No. 7 (AA-SKP-00059312–31)	√			
PX26	Holmes Test Buy No. 9 (AA-SKP-00059406–36)	√			
PX27	Holmes Test Buy No. 13 (AA-SKP-00059500–18)	√			
PX28	Holmes Test Buy No. 14 (AA-SKP-00059537–55)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX29	Holmes Test Buy No. 15 (AA-SKP-00059556–88)	√			
PX30	Holmes Test Buy No. 17 (AA-SKP-00059659–76)	√			
PX31	Recorded Booking on Skiplagged.com (AA-SKP-00103700 & AA-SKP-00103701)	√			
PX32	Email chain between D. Gellert, A. Zaman, A. Ghisa, and A Stein dated 6/22/2023 re: Executed FP x SL MNDA and Skiplagged Company Overview Deck (SKP00078122–40)	√			
PX33	Skiplagged Onboarding Marketing Survey (SKP00081041–44)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX34	Email chain between D. Gellert, K. Roseberg, A. Brady, P. Vadavia and N. D'Amico dated 10/29/2021 re: OPM Pros Gen3 x Skiplagged Questionnaire (SKP00095584–85 & SKP00095589–92)	√			
PX35	Skiplagged Brand Strategy Deck (SKP00081054–109)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX36	American Customer Complaint (AA-SKP-00052673–74)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX37	American Customer Complaint (AA-SKP-00052679)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX38	American Customer Complaint (AA-SKP-00052684–85)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX39	American Customer Complaint (AA-SKP-00052718–19)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one		

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			other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX40	American Customer Complaint (AA-SKP-00052734–35)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX41	American Customer Complaint (AA-SKP-00052736–39)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX42	American Customer Complaint (AA-SKP-00052845–47)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX43	American Customer Complaint (AA-SKP-00052722–23)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX44	American Customer Complaint (AA-SKP-00052724–25)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX45	American Customer Complaint (AA-SKP-00052764–66)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX46	American Customer Complaint (AA-SKP-00052798–801)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			This exhibit is also outside the relevant time period because it is from September 2018. FRE 401.		
PX47	American Customer Complaint (AA-SKP-00052895–97)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX48	American Customer Complaint (AA-SKP-00052952–54)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX49	American Customer Complaint (AA-SKP-00053003–06)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX50	American Customer Complaint (AA-SKP-00053199–201)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright would confuse the jury. FRE 401, 403.		
PX51	American Customer Complaint (AA-SKP-00053293–95)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX52	American Customer Complaint (AA-SKP-00053296–98)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX53	American Customer Complaint (AA-SKP-00053339–41)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation.. FRE 901; Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX54	American Customer Complaint (AA-SKP-00053349–51)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901; Irrelevant because it does not relate to AA's trademarks or		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			copyright and would confuse the jury. FRE 401, 403.		
PX55	American Customer Complaint (AA-SKP-00063900–02)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901; Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period and would confuse the jury. FRE 401, 403.		
PX56	American Customer Complaint (AA-SKP-00063485–87)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX57	American Customer Complaint (AA-SKP-00064309–12)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX58	American Customer Complaint (AA-SKP-00064555–57)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX59	American Customer Complaint (AA-SKP-00092673–75)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			would confuse the jury. FRE 401, 403.		
PX60	American Customer Complaint (AA-SKP-00094987–89)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX61	American Customer Complaint (AA-SKP-00095573–77)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX62	American Customer Complaint (AA-SKP-00101033–35)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX63	Skiplagged Customer Complaint (SKP00001001)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX64	Skiplagged Customer Complaint (SKP00001031–32)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX65	Skiplagged Customer Complaint (SKP00001141–42)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX66	Skiplagged Customer Complaint (SKP00001153–55)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX67	Skiplagged Customer Complaint (SKP00001387)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX68	Skiplagged Customer Complaint (SKP00001409–10)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX69	Skiplagged Customer Complaint (SKP00001488–92)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX70	Skiplagged Customer Complaint (SKP00002212)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX71	Skiplagged Customer Complaint (SKP00004212)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX72	Skiplagged Customer Complaint (SKP00010474-76)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX73	Skiplagged Customer Complaint (SKP00012618–20)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX74	Skiplagged Customer Complaint (SKP00015624–30)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX75	Skiplagged Customer Complaint (SKP00050999–1000)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX76	Skiplagged Customer Complaint (SKP00060612–14)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX77	Skiplagged Customer Complaint (SKP00071936–39)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been		

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			properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX78	Skiplagged Customer Complaint (SKP00071991–92)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX79	Skiplagged Customer Complaint (SKP00079796–98)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX80	Skiplagged Customer Complaint (SKP00080593–95)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not		

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			subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX81	Skiplagged Customer Complaint (SKP00084903–06)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX82	Skiplagged Customer Complaint (SKP00093654–55)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX83	Skiplagged Customer Complaint (SKP00102530–32)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one		

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			other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX84	Skiplagged Customer Complaint (SKP00002129–30)		Hearsay and hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802. Exhibit has not been properly authenticated and lacks foundation. FRE 901. Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX85	Skiplagged Customer Complaint (SKP00002210)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and		

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			would confuse the jury. FRE 401, 403.		
PX86	Skiplagged Customer Complaint (SKP00002507)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and would confuse the jury. FRE 401, 403.		
PX87	Skiplagged Customer Complaint (SKP00004168)		Hearsay within hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and would confuse the jury. FRE 401, 403.		
PX88	Skiplagged Customer Complaint (SKP00004213–15)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			would confuse the jury. FRE 401, 403.		
PX89	Skiplagged Customer Complaint (SKP00024561–64)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX90	Skiplagged P&L – 2018 (SKIP0000634)		Irrelevant because it is outside the relevant time period. FRE 401.		
PX91	Skiplagged Balance Sheet - 2018 (SKIP0000628)		Irrelevant because it is outside the relevant time period. FRE 401.		
PX92	Skiplagged P&L – 2019 (SKIP0000635)	√			
PX93	Skiplagged Balance Sheet – 2019 (SKIP0000629)	√			
PX94	Skiplagged P&L – 2020 (SKIP0000636)	√			
PX95	Skiplagged Balance Sheet - 2020 (SKIP0000630)	√			
PX96	Skiplagged P&L – 2021 (SKIP0000637)	√			
PX97	Skiplagged Balance Sheet – 2021 (SKIP0000631–32)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX98	Skiplagged P&L – 2022 (SKIP0000638)	√			
PX99	Skiplagged Balance Sheet – 2022 (SKIP0000633)	√			
PX100	Skiplagged P&L – 2023 (SKP00111227)	√			
PX101	Skiplagged Balance Sheet – 2023 (SKP00111226)	√			
PX102	Skiplagged Data (SKP00111228)	√			
PX103	Email chain dated 11/14/2021 between D. Gellert and R. Chemtob and A. Brady re: Meeting Follow Up (SKP00053764–67)	√			
PX104	Spreadsheet re: Skiplagged Bookings (SKP00081039)		Irrelevant, misleading, confusing to the jury. FRE 401-403. This spreadsheet is not only illegible but as AA has been informed on multiple occasions, is not accurate data. It also does not relate to AA's Lanham Act or copyright claims.		
PX105	Spreadsheet re: Skiplagged Bookings (SKP00081151)		Irrelevant, misleading, confusing to the jury. FRE 401-403. This spreadsheet is not only illegible but as AA has been informed on multiple occasions, is not accurate data. It also does not relate to AA's Lanham Act or copyright claims.		
PX106	Spreadsheet re: Skiplagged Bookings (SKP00081157)		Irrelevant, misleading, confusing to the jury. FRE 401-403. This spreadsheet is not only illegible but as		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
			AA has been informed on multiple occasions, is not accurate data. It also does not relate to AA's Lanham Act or copyright claims.		
PX107	Spreadsheet re: Skiplagged Bookings (SKP00103762)		Irrelevant, misleading, confusing to the jury. FRE 401-403. This spreadsheet is not only illegible but as AA has been informed on multiple occasions, is not accurate data. It also does not relate to AA's Lanham Act or copyright claims.		
PX108	Spreadsheet re: Skiplagged Bookings (SKP00103781)		Irrelevant, misleading, confusing to the jury. FRE 401-403. This spreadsheet is not only illegible but as AA has been informed on multiple occasions, is not accurate data. It also does not relate to AA's Lanham Act or copyright claims.		
PX109	Email chain between L. Paterson and D. Gellert dated 11/2/2022 re: Skiplagged Monthly Supply Partner Report and attached Spreadsheets (SKP00067993–96)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403; Exhibit attachments have not been properly authenticated. FRE 901; Exhibit lacks foundation		
PX110	Email chain between M. Docherty and A. Zaman, T. Nahar dated 9/4/2018 re:		Hearsay, the exhibit is a statement made by one other than the witness,		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
	Skyscanner / Skiplagged : Moving forward... and Attached Spreadsheet (SKP00081625-32)		offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Exhibit has not been properly authenticated. FRE 901; Exhibit lacks foundation; Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX111	Spreadsheet of 2022 AA Hidden City Complaints (SKP00081150)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX112	Spreadsheet of 2021 AA Hidden City Complaints (SKP00081180)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX113	Spreadsheet of Skiplagged Customer Complaints 2019 (SKP00081216)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury. FRE 401, 403.		
PX114	Fuller Deloitte Spreadsheet (FULLER_001)	√			
PX115	Fuller Deloitte Spreadsheet (FULLER_002)	√			
PX116	Fuller Deloitte Spreadsheet (FULLER_003)	√			
PX117	Fuller Deloitte Spreadsheet (FULLER_004)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX118	Fuller Deloitte Spreadsheet (FULLER_005)	√			
PX119	Fuller Deloitte Spreadsheet (FULLER_006 (Replacement))	√			
PX120	Fuller Deloitte Spreadsheet (FULLER_007)	√			
PX121	Fuller Deloitte Spreadsheet (FULLER_008)	√			
PX122	Fuller Deloitte Spreadsheet (FULLER_009)	√			
PX123	American Hidden City Busters Deck (AA-SKP-00050225-57)	√			
PX124	Email chain dated 5/31/2017 between C. Garner, V. Vogel, and N. Geurin re: ADP Withdrawal Request (AA-SKP-00005302-03)	√			
PX125	Email chain between V. Vogel, C. Garner, and N. Geurin dated 5/31/2017 re: ADP Withdrawal Request (AA-SKP-00005304-05)	√			
PX126	Email chain dated 6/9/2017 between Neil Geurin and Vineeta Vogel re: QIKFIX-LAST10-357732-09JUN09:14:04-FOR QIK CHK ON SABRE (AA-SKP-00005277-79)	√			
PX127	Email chain dated 11/1/2017 re: Google will no longer offer its flight price data to other sites (AA-SKP-00005301)	√			
PX128	Email chain dated 3/6/2018 between J. Creech and N. Geurin re: Skiplagged.com (AA-SKP-00010763-65)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX129	Email chain dated 3/6/2018 between Darrin Goodreau, Brandon Norman, Scott Chandler, and others re: Skiplagged.com (AA-SKP-00010759–60)	√			
PX130	Email chain dated 3/9/2018 between Neil Geurin and Kevin McFarland re: Skiplagged.com (AA-SKP-00010792–96)	√			
PX131	Email chain dated 3/9/2018 between Scott Chandler, Neil Geurin, Tom Jiede, and others re: Skiplagged (AA-SKP-00010363–64)	√			
PX132	Email chain dated 5/22/2018 between Scott Chandler, Brandon Norman, Tony Yavasile, and others re: YUL and YTO agents short-checking bags (AA-SKP-00059914–15)	√			
PX133	Email chain dated 5/31/2018 between Scott Chandler and Tony Yavasile re: YUL and YTO agents short-checking bags (AA-SKP-00059916–21)	√			
PX134	Email chain dated 5/31/2018 between Scott Chandler, Melody Andersen, and Jennifer Proctor re: Baggage (AA-SKP-00059922–26)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright, would confuse the jury, is outside the relevant time period, and is prejudicial. FRE 401, 403.		
PX135	Email chain dated 8/24/2018 from D. Goodreau re: Hidden city w/ bag delivery (AA-SKP-00059930–32)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX136	Email chain dated 9/5/2018 from S. Srinivasan re: Hidden cities (AA-SKP-00008329–31)	√			
PX137	Email chain dated 9/6/2018 between D. Goodreau, V. Pilla, and S. Srinivasan re: Hidden City Ticketing (AA-SKP-00059927–29)	√			
PX138	Email chain dated 10/22/2018 between Melody Andersen, Laura Banse, Jennifer Proctor, and others re: Skiplagged (AA-SKP-00062165–72)	√			
PX139	Email chain dated 1/2/2019 between Kevin Macfarland, Neil Geurin and others re: Skiplagged.com (AA-SKP-00005532–34)	√			
PX140	Email chain dated 5/28/2019 between Ryan Conly and John Ulrich, re: Hidden City (AA-SKP-00062150–54)	√			
PX141	Email chain dated 5/28/2019 between Javier Barreiro, Anthony Capalbo and others re: Delay AA1111 (AA-SKP-00005460–62)	√			
PX142	Email chain dated 5/29/2019 between Darrin Goodreau, Melissa Leach, Neil Geurin, Tom Jiede and others re: Hidden City (AA-SKP-00005452–56)	√			
PX143	Email chain dated 6/24/2019 between Jay Creech, Jay, Tom Jiede, Mariel Ferrara, Neil Geurin, and Darrin Goodreau re: Some questions from ATL (AA-SKP-00005416–19)	√			
PX144	Email chains between T. Jiede, D. Goodreau, and others at AA dated 8/30/2019 re: Security Incident MIA F277 MIA-LAX and attachment (AA-SKP-00059850–71)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX145	Predicting Hidden City Itineraries dated 10/18/2019 (AA-SKP-00050477-83)	√			
PX146	Email chain dated 12/26/2019 between Marcial Lapp and Neil Geurin re: Customer: Cierra Zacchaeus (AA-SKP-00005560-61)	√			
PX147	Email chain dated 1/3/2020 between Richard Grantvedt and Marcial Lapp re: Customer: Cierra Zacchaeus (AA-SKP-00005700-05)	√			
PX148	Email chain date 1/7/2020 between J. Faith, K. Shetty and AA.com architect team re: Kayak Source (AA-SKP-00005765-70)	√			
PX149	Email chain dated 6/10/2020 between Tim Rogers, Jay Creech, and others re: Distribution strategy contact for North America (AA-SKP-00059954-56)		Hearsay, the exhibit is a statement made by one other than the witness, offered for the truth of the matter asserted, and not subject to any hearsay exception. FRE 801, 802; Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury and is prejudicial. FRE 401, 403.		
PX150	Email chain dated 7/27/2020 between Jay Creech and Tazmun Nahar re: American Airlines <> Skiplagged; Calendar invitations from Tazmun Nahar to Jay Creech to meet on Jun 12, 2020 2:30pm - 3pm (CDT) and Jul 28, 2020 3pm - 3:30pm (CDT) (AA-SKP-00060095-99 & AA-SKP-00060080 & AA-SKP-00060082)	√			
PX151	Email chain dated 1/4/2020 between Marcial Lapp and James Faith re: Kayak Source (AA-SKP-00005706-08)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX152	Email chains dated 10/6/2020 between John Ulrich, Shashank Menon and German Rivera, re: Hidden City query (AA-SKP-00006403-05 & AA-SKP-00012934-42)	√			
PX153	Email chain dated 10/26/2020 between Vasu Raja, Alfred Campbell, Marcial Lapp, and others re: PNR MRCROV (AA-SKP-00005771)	√			
PX154	Email chain dated 11/16/2020 between Justin Dunn, Marcial Lapp, and Susan Michael re: Same GDS rule (AA-SKP-00065144)	√			
PX155	Email chain dated 1/27/2021 between Scott Chandler and Vasu Raja re: American Airlines Travel News and Information - An update on Booking and Ticketing Practices (AA-SKP-00059823-26)	√			
PX156	Email chain dated 2/15/2021 between Shashank Menon, Marcial Lapp and Justin Dun re: Skiplagged (AA-SKP-00005795-98)	√			
PX157	Email chain dated 3/18/2021 between Jayson Hardeman and Scott Chandler re: Hidden City FYI & Question (AA-SKP-00059827)	√			
PX158	Email chain dated 83/18/2021 between Scott Chancler and Jayson Hardeman re: Hidden City FYI & Question (AA-SKP-00059822)	√			
PX159	Email chain dated 3/21/2018 between Scott Chandler, Shaibaz Gadhwal, Jay Creech, and others re: Skiplagged.com (AA-SKP-00059835-38)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX160	Email chain dated 4/14/2022 between Scott Chandler and Marcial Lapp re: landline (L4) Update (AA-SKP-00005141-43)	√			
PX161	Email chain dated 4/26/2021 between German Rivera, Jayson Hardeman, and Shashank Menon re: JH_HIDDEN_CTY.xlsx (AA-SKP-00002751-58)	√			
PX162	Email chain dated 7/10/2021 between Marcial Lapp and DL_RM_RIDT re: Weekend Review: Southwest Airlines in a Legal Tussle (AA-SKP-00000378-88)	√			
PX163	Email chain dated 7/30/2021 between Marcial Lapp and Chandler Scott re: Hidden City Party ID and attached Spreadsheet (AA-SKP-00005134-35)	√			
PX164	Email chain dated 8/2/2021 between Marcial Lapp and German Rivera re: WN is suing Skiplagged (AA-SKP-00000377)	√			
PX165	Email chain dated 8/2/2021 between Jayson Hardeman and German Rivera re: Hidden City Party ID (AA-SKP-00001360-62)	√			
PX166	Email chain dated 8/2/2021 between Marcial Lapp, Meghan Jordan, and Heather Samp re: Hidden City Party ID (AA-SKP-00005780-81)	√			
PX167	Email chain between G. Rivera, A. Radar, and others at AA dated 8/26/2021 re: Questions about Kiwi.com for the Czech business newspaper (AA-SKP-00010559-65)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX168	Email chain between S. Tucker, G. Rivera, and R. Villarreal dated 11/8/2021 re: IATA 0564802 restricted (AA-SKP-00000902-05)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury and is prejudicial. FRE 401, 403.		
PX169	Email chain dated 7/26/2022 between Mariana Letelier, Marcial Lapp, and Jerry Foran re: Delta Air Lines I Booking Policy Update (AA-SKP-00012604-09)	√			
PX170	Email chain dated 1/28/2023 between Marcial Lapp and Paola Martinez (AA-SKP-00000971-75)	√			
PX171	Email chain dated 2/3/2023 between M. Lapp, S. Chandler, and N. Geurin re: This is interesting (AA-SKP-00005618-19)	√			
PX172	Email chain dated 7/5/2023 between Shashank Menon, Anmol Sabharwal, Ben Segal, and others re: Purchased on AA.com but not in our Digital Data (Adobe/QM) (AA-SKP-00006597-600)	√			
PX173	Teams Chat between S. Menon and A. Sabharwal dated 7/7/2023 (AA-SKP-00013136-38)	√			
PX174	Email chain dated 7/12/2023 between Andrea Koos, Scott Chandler, Brandon Norman, Randeep Ramamurthy, Marcial Lapp, and others re: Media inquiries about hidden city ticketing (AA-SKP-00000135)	√			
PX175	Email chain dated 7/18/2023 between Marcial Lapp, Andrea Koos, Neil Geurin, Thomas Rajan and others re: banning a customer for skip lagging? (AA-SKP-00000294)	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX176	Skiplagged Slack Chat (SKP00105924–26)	√			
PX177	Skiplagged Slack Chat (SKP00092041–43)	√			
PX178	Skiplagged Slack Chat (SKP00105999–6005)	√			
PX179	Skiplagged Slack Chat (SKP00107954–63)	√			
PX180	Skiplagged Slack Chat (SKP00095889–93)	√			
PX181	Skiplagged Slack Chat (SKP00105816–21)	√			
PX182	Skiplagged Slack Chat (SKP00105805–11)	√			
PX183	Zaman Reddit AMA (AA-SKP-00103565–68)		Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and would confuse the jury. FRE 401, 403.		
PX184	Skiplagged Terms and Conditions (SKIP00000010–11)	√			
PX185	Skiplagged About and FAQ (SKIP00000072–77)	√			
PX186	2014 United and Orbitz Lawsuit (SKIP00000078–112)		Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and would confuse the jury and is prejudicial. FRE 401, 403.		

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
PX187	February 2015 Fareportal C&D (SKIP0000626–27)		Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and would confuse the jury and is prejudicial. FRE 401, 403.		
PX188	July 2018 Delta C&D (SKIP0000404–625)		Irrelevant because it does not relate to AA's trademarks or copyright, is outside the relevant time period, and would confuse the jury and is prejudicial. FRE 401, 403.		
PX189	June 2021 Southwest 1st C&D (SKIP0000286–301)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury and is prejudicial. FRE 401, 403.		
PX190	June 2021 Southwest 2nd C&D (SKIP0000302–12)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury and is prejudicial. FRE 401, 403.		
PX191	June 2021 Skiplagged Response to Southwest C&D (SKIP0000313–15)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury and is prejudicial. FRE 401, 403.		
PX192	August 2019 TripAdvisor C&D (SKP00084980–83)		Irrelevant because it does not relate to AA's trademarks or copyright and would confuse the jury and is prejudicial. FRE 401, 403.		
Demonstratives					
	Opening Statement Demonstratives	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
	Closing Argument Demonstratives	√			
	Fuller Demonstratives	√			
	Wind Demonstratives	√			
	John Demonstratives	√			
	Gutzler Demonstratives	√			
	How the Travel Industry/Distribution Works Demonstratives	√			
	AA Trademark Demonstratives	√			
	Skiplagged Use of AA Trademarks Demonstratives	√			
	AA Flight Symbol Design Demonstratives	√			
	Skiplagged Use of AA Flight Symbol Design Demonstratives	√			
	Skiplagged Use of AA Trademarks Compared to Authorized Agents Demonstratives	√			
	Rob Holmes Test Buy Demonstratives	√			
	Harm to AA Caused by Skiplagged Demonstratives	√			
	American's Lost Revenue Demonstratives	√			

Ex. No.	Description	Agreed	Objection(s)	Offered	Admitted
	How American's Travel Agents Support Customers Demonstratives	√			
	How Skiplagged Avoids Duties to Customers/Skiplagged Services Demonstratives	√			
	American's Efforts to Stop Skiplagged/Skiplagged Timeline Demonstratives	√			
	Consumer Complaint Demonstratives	√			
	Skiplagged Data (SKP00111228) Demonstratives	√			
	Skiplagging Demonstrative	√			
	Skiplagged Business Model Demonstratives	√			

STATEMENT REGARDING OBJECTIONS

The foregoing document accurately reflects all objections to American's trial exhibits and the bases therefore.

Dated: September 27, 2024

Respectfully submitted,

/s/ Dee J. Kelly, Jr.

Dee J. Kelly, Jr.
State Bar No. 11217250
dee.kelly@kellyhart.com
Julia G. Wisenberg
State Bar No. 24099146
julia.wisenberg@kellyhart.com
KELLY HART & HALLMAN LLP
201 Main Street, Suite 2500
Fort Worth, Texas 76102
Telephone: (817) 332-2500

R. Paul Yetter
State Bar No. 22154200
pyetter@yettercoleman.com
YETTER COLEMAN LLP
811 Main Street, Suite 4100
Houston, Texas 77002
Telephone: (713) 632-8003

Cameron M. Nelson
nelsonc@gtlaw.com
GREENBERG TRAURIG LLP
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
Telephone: (312) 456-6590

Nathan J. Muyskens
nathan.muyskens@gtlaw.com
GREENBERG TRAURIG LLP
2101 L Street, N.W., Suite 1000
Washington, DC 20037
Telephone: (202) 331-3100

ATTORNEYS FOR PLAINTIFF

/s/ William L. Kirkman

William L. Kirkman
State Bar No. 11518700
billk@kirkmanlawfirm.com
Preston B. Sawyer
State Bar No. 24102465
prestons@kirkmanlawfirm.com
KIRKMAN LAW FIRM, PLLC
201 Main Street, Suite 1160
Fort Worth, Texas 76102
Telephone: (817) 336-2800
Facsimile: (817) 877-1863

Aaron Z. Tobin
Texas Bar No. 24028045
atobin@condontobin.com
Kendal B. Reed
Texas Bar No. 24048755
kreed@condontobin.com
Abigail R.S. Campbell
Texas Bar No. 24098959
acampbell@condontobin.com
CONDON TOBIN SLADEK THORNTON
NERENBERG PLLC
8080 Park Lane, Suite 700
DALLAS, TEXAS 75231
Telephone: (214) 265-3800
Facsimile: (214) 691-6311

Darin M. Klemchuk
Texas Bar No. 24002418
darin.klemchuk@klemchuk.com
KLEMCHUK LLC
8150 North Central Expressway, 10th Floor
Dallas, Texas 75206
Telephone: (214) 367-6000
Facsimile: (214) 367-6001

ATTORNEYS FOR DEFENDANT

II. DEPOSITION TESTIMONY DESIGNATIONS

On September 27, 2024, Skiplagged filed Deposition Designations listing Varvara Reva, the corporate representative of Kiwi.com, Inc. and Kiwi.com, s.r.o., and Marcial Lapp, individually and as the corporate representative of American. [Dkt. No. 292 at 4–10]. Skiplagged included American’s previously-asserted objections and counter-designations and Skiplagged’s objections to American’s counter-designations. However, the parties have reached an agreement that: (1) Marcial Lapp will testify live at trial; and (2) if Skiplagged plays the deposition video for Ms. Reva at trial, it will play the entirety of Skiplagged’s deposition designations and American’s counter-designations in order, with both parties withdrawing their objections.

Based on the parties’ agreement and Skiplagged’s Deposition Designations [Dkt. No. 292], American is also providing the Court with a copy of its deposition designations for Aktarer Zaman, individually and as the corporate representative of Skiplagged, and Daniel Gellert, including Skiplagged’s objections and counter-designations. However, the parties have agreed that Mr. Zaman and Mr. Gellert will testify live at trial, and with Skiplagged withdrawing its objections. The parties’ objections and counter-designations are made solely in the event that part of Mr. Lapp, Mr. Zaman, or Mr. Gellert’s depositions must be used at trial pursuant to Rule 32 (e.g., unavailability of witness due to illness).

1. Aktarer Zaman (taken on May 29, 2024)

Aktarer Zaman (May 29, 2024)		
American’s Deposition Designation	Skiplagged’s Objection(s)	Skiplagged’s Counter-Designation(s)
5:1 – 5:3	None	
5:14 – 5:20	None	
12:7 – 12:13	None	
22:21 – 22:25	None	
28:19 – 28:23	None	
29:3 – 29:6	None	
32:4 – 32:13	None	

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
32:15 – 33:6	None	
33:20 – 33:22	Skiplagged objects to this deposition designation as irrelevant. FRE 401, 403. How, why, or if Skiplagged's user interface informs a consumer about pricing of a direct flight versus a hidden-city flight in no way relates to the Lanham Act claims or copyright damages in this litigation, would mislead the jury, and confuse the issues.	33:23
33:24 – 33:25	Skiplagged objects to this deposition designation as irrelevant. FRE 401, 403. How, why, or if Skiplagged's user interface informs a consumer about pricing of a direct flight versus a hidden-city flight in no way relates to the Lanham Act claims or copyright damages in this litigation, would mislead the jury, and confuse the issues.	
44:6 – 45:9	None	
45:16 – 45:18	None	
46:7 – 46:20	None	
51:5 – 52:8	Skiplagged objects to this deposition designation as irrelevant. FRE 401, 403. How or if Skiplagged provides "live information" to customers in no way relates to the Lanham Act claims or copyright damages in this litigation, would mislead the jury, and confuse the issues.	52:9
52:10 – 52:11	None	
55:10 – 55:15	None	
56:14 – 57:2	None	
57:16 – 57:19	None	
60:14 – 61:4	None	
62:15 – 62:22	None	62:23
62:24 – 63:12	None	
63:16 – 64:5	None	64:6
64:7 – 64:13	None	64:14
64:15 – 64:23	None	64:24

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
64:25 – 65:2	None	65:3
65:4 – 65:6	None	65:7
65:8 – 65:16	None	65:17
65:18 – 65:20	None	65:21-23
65:24	None	
67:19 – 68:2	Skiplagged objects to this deposition designation as irrelevant. FRE 401, 403. Priceline providing information to Skiplagged and the related chargebacks from customers in no way relates to the Lanham Act claims or copyright damages in this litigation, would mislead the jury, and confuse the issues.	
68:8 – 68:13	Skiplagged objects to this deposition designation as irrelevant. FRE 401, 403. Priceline providing information to Skiplagged and the related chargebacks from customers in no way relates to the Lanham Act claims or copyright damages in this litigation, would mislead the jury, and confuse the issues.	
71:12 – 71:16	Skiplagged objects to this deposition designation because the questioning misstating Mr. Zaman's prior testimony. FRE 611.	71:17
71:18 – 72:4	None	
72:10 – 72:22	Skiplagged objects to this deposition designation and instructed Mr. Zaman not to answer the question during the deposition because it calls for information protected by the attorney-client privilege. FRE 502.	72:23-73:1
73:2 – 73:11	Skiplagged objects to this deposition designation and instructed Mr. Zaman not to answer the question during the deposition because it calls for information protected by the attorney-client privilege. FRE 502.	73:12-22
73:23	Skiplagged objects to this deposition designation and instructed Mr.	

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	Zaman not to answer the question during the deposition because it calls for information protected by the attorney-client privilege. FRE 502.	
78:7 – 78:9	None	
78:11 – 78:15	None	
83:22 – 84:9	None	84:10-15
85:19 – 85:23	None	
86:6 – 86:10	None	86:19-87:2
87:6 – 87:19	None	
88:19 – 89:23	Skiplagged objects to this deposition designation because it seeks an improper opinion from a lay witness regarding a legal conclusion and because Mr. Zaman lacks personal knowledge regarding Plaintiff's trademarks. FRE 602, 701.	89:24
89:25 – 90:2	None	
90:6 – 90:19	Skiplagged objects to this deposition designation because it seeks an improper opinion from a lay witness regarding a legal conclusion and because Mr. Zaman lacks personal knowledge regarding Plaintiff's trademarks. FRE 602, 701.	90:20
90:21 – 91:17	Skiplagged objects to this deposition designation because it seeks an improper opinion from a lay witness regarding a legal conclusion and because Mr. Zaman lacks personal knowledge regarding Plaintiff's trademarks. FRE 602, 701.	
97:1 – 97:9	None	
97:14 – 97:17	None	
103:9 – 109:24	106:1-17 - Skiplagged objects to this deposition designation because the questioning misstates Mr. Zaman's prior testimony and is irrelevant. FRE 401, 611.	
108:1 – 108:12	None	
108:20 – 108:25	None	
111:6 – 111:11	None	

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
115:2 – 116:17	None	116:18
116:19 – 116:21	None	
117:9 – 119:11	None	
119:22 – 120:6	None	
123:12 – 124:9	None	
139:2 – 139:8	None	
139:17 – 139:19	None	
159:21 – 160:1	None	
164:3 – 165:7	Skiplagged objects to this deposition designation because it seeks an improper opinion from a lay witness regarding a legal conclusion and because Mr. Zaman lacks personal knowledge regarding Plaintiff's trademarks. FRE 602, 701.	165:9
165:10 – 166:2	Skiplagged objects to this deposition designation because it seeks an improper opinion from a lay witness regarding a legal conclusion and because Mr. Zaman lacks personal knowledge regarding Plaintiff's trademarks. FRE 602, 701.	
167:14 – 167:17	Skiplagged objects to this deposition designation because it calls for speculation outside the personal knowledge of Mr. Zaman. FRE 602, 701	167:18
167:19 – 167:21	Skiplagged objects to this deposition designation because it calls for speculation outside the personal knowledge of Mr. Zaman. FRE 602, 701	167:23
167:24 – 167:25	Skiplagged objects to this deposition designation because it calls for speculation outside the personal knowledge of Mr. Zaman. FRE 602, 701	
185:6 – 185:10	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are	

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	
185:16 – 185:18	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	185:19
185:20 – 185:25	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	
186:13 – 186:19	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	186:20
186:21 – 187:2	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with	187:3

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	
187:4 – 187:7	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	187:8
187:9 – 187:14	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	
188:1 – 188:2	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	188:3
188:4 – 188:7	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's	188:8

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	
188:9 – 188:15	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	188:16
188:17	Skiplagged objects to this deposition designation as irrelevant and improper settlement evidence. FRE 401, 403, 408. Skiplagged's settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation and would only serve to mislead the jury and confuse the issues.	
194:2 – 194:18	Skiplagged objects to this deposition designation and the corresponding Exhibits 5 and 6 as irrelevant. FRE 401, 403. The relevant statutes of limitations in this case are 3 and 4 years. Thus, Skiplagged's financial information from 2018 is not relevant to the Lanham Act or copyright damages claims in this litigation.	
197:11 – 197:20	Skiplagged objects to this deposition designation and the corresponding Exhibits 5 and 6 as irrelevant. FRE 401, 403. The relevant statutes of	

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	limitations in this case are 3 and 4 years. Thus, Skiplagged's financial information from 2018 is not relevant to the Lanham Act or copyright damages claims in this litigation.	
200:3 – 200:12	None	
201:1 – 201:5	Skiplagged objects to this deposition designation as irrelevant and prejudicial. FRE 401, 403. Skiplagged's assets are not relevant to this litigation and could only be used as prejudice against Skiplagged regarding its financial status.	201:6
201:7 – 201:10	Skiplagged objects to this deposition designation as irrelevant and prejudicial. FRE 401, 403. Skiplagged's assets are not relevant to this litigation and could only be used as prejudice against Skiplagged regarding its financial status.	201:12
201:13 – 201:16	Skiplagged objects to this deposition designation as irrelevant and prejudicial. FRE 401, 403. Skiplagged's assets are not relevant to this litigation and could only be used as prejudice against Skiplagged regarding its financial status.	201:17
201:18 – 201:19	Skiplagged objects to this deposition designation as irrelevant and prejudicial. FRE 401, 403. Skiplagged's assets are not relevant to this litigation and could only be used as prejudice against Skiplagged regarding its financial status.	201:20
201:21 – 201:22	Skiplagged objects to this deposition designation as irrelevant and prejudicial. FRE 401, 403. Skiplagged's assets are not relevant to this litigation and could only be used as prejudice against Skiplagged regarding its financial status.	
203:3 – 203:4	Skiplagged objects to this deposition	203:5

Aktarer Zaman (May 29, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	designation as irrelevant and prejudicial. FRE 401, 403. Mr. Zaman's salary from Skiplagged is not relevant to the claims in this litigation and can only be used to prejudice the jury against Skiplagged and Mr. Zaman.	
203:6 – 203:13	Skiplagged objects to this deposition designation as irrelevant and prejudicial. FRE 401, 403. Mr. Zaman's salary from Skiplagged is not relevant to the claims in this litigation and can only be used to prejudice the jury against Skiplagged and Mr. Zaman.	

2. Aktarer Zaman, as Skiplagged's Rule 30(b)(6) Corporate Representative (taken on June 12, 2024)

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
6:21 – 7:5	None	
7:9 – 7:19	None	
7:24 – 8:24	None	
17:9 – 18:22	None	
19:15 – 20:9	None	
20:19 – 21:17	Skiplagged objects to these deposition designations because AA does not include the answer to the designated question, thus making the testimony incomplete and misleading. FRE 106, 403.	21:18-21
23:6 – 23:12	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	
25:22 – 26:5	None	
26:11 – 27:12	Skiplagged objects to these deposition designations because AA does not include the answer to the designated question, thus making the testimony incomplete and misleading. FRE 106, 403.	27:13-18
27:20 – 28:7	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	
28:16 – 28:23	None	28:24
28:25 – 29:13	None	
30:6 – 30:17	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	
32:15 – 33:23	Skiplagged objects to these deposition designations	33:24-34:4

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	because AA does not include the answer to the designated question, thus making the testimony incomplete and misleading. FRE 106, 403.	
34:6 – 34:19	Skiplagged objects to this deposition designation because it calls for speculation as to knowledge of third parties. FRE 701.	34:20
34:21 – 36:4	Skiplagged objects to this deposition designation because it calls for speculation as to knowledge of third parties. FRE 701.	
47:6 – 47:10	Skiplagged objects to this deposition designation as irrelevant. FRE 401. Whether Skiplagged has ever used conversion rate to justify a business decision in no way relates to the Lanham Act and copyright damages claims at issue in this litigation.	
57:12 – 58:25	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	
66:19 – 66:24	None	
74:2 – 74:18	None	
85:14 – 85:21	None	
86:23 – 87:7	None	
176:20 – 177:7	Skiplagged objects to these deposition designations as	177:8

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	irrelevant. FRE 401, 403. Skiplagged's IP address information is not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the relevant issues.	
177:9 – 178:6	Skiplagged objects to these deposition designations as irrelevant. FRE 401, 403. Skiplagged's IP address information is not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the relevant issues.	178:7
178:8 – 178:11	Skiplagged objects to these deposition designations as irrelevant. FRE 401, 403. Skiplagged's IP address information is not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the relevant issues.	
179:15 – 179:25	Skiplagged objects to these deposition designations as irrelevant. FRE 401, 403. Skiplagged's IP address information is not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the relevant issues.	180:2
180:3 – 180:17	Skiplagged objects to these deposition designations as irrelevant. FRE 401, 403. Skiplagged's IP address information is not relevant to	180:18

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the relevant issues.	
180:19 – 180:21	Skiplagged objects to these deposition designations as irrelevant. FRE 401, 403. Skiplagged's IP address information is not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the relevant issues.	
198:19 – 198:21	Skiplagged objects to these deposition designations as irrelevant. FRE 401. Whether Skiplagged generates vague business reports from its database is not relevant to the Lanham Act and copyright damages claims at issue in this litigation.	198:22
198:23 – 198:25	Skiplagged objects to these deposition designations as irrelevant. FRE 401. Whether Skiplagged generates vague business reports from its database is not relevant to the Lanham Act and copyright damages claims at issue in this litigation.	
199:7 – 201:5	Skiplagged objects to these deposition designations as irrelevant. FRE 401. Whether Skiplagged generates vague business reports from its database is not relevant to the Lanham Act and copyright damages claims at issue in this litigation.	201:6
201:7 – 201:8	Skiplagged objects to these	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	deposition designations as irrelevant. FRE 401. Whether Skiplagged generates vague business reports from its database is not relevant to the Lanham Act and copyright damages claims at issue in this litigation.	
208:14 – 208:19	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	208:20-21
208:22 – 209:9	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	209:10
209:11 – 209:18	Skiplagged objects to these deposition designations as irrelevant and calling for	209:19-20

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
209:22 – 209:23	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	209:24
209:25 – 211:2	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly	211:3-7

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	confuse the jury as to the issues.	
211:8 – 211:12	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	211:13
211:14 – 211:23	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	211:24
211:25 – 212:10	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and	212:11-14

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
212:15 – 213:3	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
213:16 – 213:23	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
214:13 – 215:5	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
216:18 – 217:4	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
217:18 – 218:7	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	issues.	
218:13 – 218:16	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	218:17-18
218:19 – 219:2	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	219:3
219:5 – 219:6	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and	219:7

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
219:8 – 219:15	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
219:22 – 220:3	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE 401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	220:4-7
220:8 – 220:16	Skiplagged objects to these deposition designations as irrelevant and calling for revealing attorney-client privileged conversations. FRE	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	401, 403, 502. The legality of hidden city ticketing or presenting information about hidden city ticketing and separate lawsuits or cease and desist letters are not relevant to the Lanham Act and copyright damages claims at issue in this litigation and would greatly confuse the jury as to the issues.	
236:3 – 236:24	None	
237:6 – 237:9	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	237:10
237:11 – 237:13	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
238:10 – 238:14	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
239:15 – 239:17	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	239:18
239:19 – 239:20	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
246:13 – 247:5	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	247:6
247:7 – 247:19	Skiplagged objects to these	247:20

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
247:21 – 248:7	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	248:8
248:9 – 248:12	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
249:4 – 249:16	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	249:17
249:18 – 249:19	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
249:25 – 250:13	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
278:13 – 279:14	None	279:15
279:16 – 280:19	None	280:20
280:21 – 280:25	None	281:2
281:3 – 281: 11	None	281:12
281:13 – 281:18	None	
293:10 – 293:20	None	293:21-294:3
294:4 – 305:2	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	
305:4 – 305:6	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	305:7
305:10 – 305:21	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	305:22
305:23 – 306:6	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is	306:7

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	argumentative.	
306:8 – 309:18	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	309:19
309:20 – 309:24	None	309:25
310:2 – 310:9	None	
313:9 – 313:11	None	
315:19 – 315:21	None	315:22
315:23 – 317:10	None	317:11-12
317:13 – 317:16	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	
320:5 – 320:14	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	320:15
320:18 – 321:3	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	321:4
321:5 – 321:22	Skiplagged objects to these	321:23

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
321:24 – 322:12	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
324:3 – 324:12	Skiplagged objects to these deposition designations as calling for legal conclusions from a lay witness that is not a lawyer. FRE 701.	
328:3 – 328:16	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	328:17
328:18 – 329:10	Skiplagged objects to these deposition designations as irrelevant and argumentative. FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	329:11
329:12 – 330:14	Skiplagged objects to these deposition designations as irrelevant and argumentative.	

Aktarer Zaman (June 12, 2024)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	FRE 401, 403. Whether or not Mr. Zaman retained records or notes on queries or answer to verified interrogatories or how production was obtained that were not asked to be produced in this litigation is not relevant to the claims in this litigation, misleads the jury, and is argumentative.	

3. Daniel Gellert (taken on November 30, 2023)

Daniel Gellert (November 30, 2023)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
5:20 – 6:11	None	
8:5 – 8:11	None	
8:21 – 10:6	None	
10:21 – 11:5	None	11:5-18
14:3 – 14:8	None	
19:4 – 19:10	None	
19:24 – 20:12	None	
24:12 – 24:16	Skiplagged objects to this deposition designation as irrelevant and asking for a legal conclusion from a lay witness who is not a lawyer. FRE 401, 403, 701. Whether or not a third-party company had authority to book AA tickets or how it functions in no way relates to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the issues.	
24:24 – 25:4	Skiplagged objects to this deposition designation as irrelevant and asking for a legal conclusion from a lay witness who is not a lawyer.	

Daniel Gellert (November 30, 2023)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
	FRE 401, 403, 701. Whether or not a third-party company had authority to book AA tickets or how it functions in no way relates to the Lanham Act and copyright damages claims at issue in this litigation and would confuse the jury as to the issues.	
31:11 – 31:24	None	
34:11 – 34:24	None	
39:13 – 39:19	None	
42:6 – 42:8	None	
45:23 – 46:3	None	
47:8 – 47:20	None	
48:6 – 49:5	None	
62:20 – 63:14	None	
63:24 – 65:2	None	
67:18 – 70:2	None	
75:13 – 75:19	None	
88:11 – 88:16	None	
93:24 – 94:14	None	
95:13 – 96:10	None	
99:15 – 100:8	None	
101:7 – 101:10	None	
113:13 – 114:17	None	
114:25 – 116:5	None	
123:24 – 125:18	None	
130:14 – 133:10	None	
133:24 – 134:8	None	
144:20 – 144:25	None	
156:16 – 157:3	Skiplagged objects to this deposition designation as irrelevant improper settlement evidence. FRE 401, 403, 408. Skiplagged's arrangements or settlement agreement with Southwest and the terms thereof are not relevant to the Lanham Act and copyright damages sought by AA in this litigation.	

Daniel Gellert (November 30, 2023)		
American's Deposition Designation	Skiplagged's Objection(s)	Skiplagged's Counter-Designation(s)
160:6 – 160:9	None	
160:20 – 160:22	None	
180:5 – 180:14	None	
182:8 – 183:11	None	
183:17 – 183:21	None	
192:8 – 192:22	None	
196:14 – 199:17	Skiplagged objects to this deposition designation as calling for a legal opinion from a lay witness that is not a lawyer. FRE 701.	
207:15 – 207:20	None	
209:4 – 209:23	None	
210:5 – 210:25	None	
211:7 – 211:17	None	

Dated: September 27, 2024

Respectfully submitted,

/s/ Dee J. Kelly, Jr.

Dee J. Kelly, Jr.

State Bar No. 11217250

dee.kelly@kellyhart.com

Julia G. Wisenberg

State Bar No. 24099146

julia.wisenberg@kellyhart.com

KELLY HART & HALLMAN LLP

201 Main Street, Suite 2500

Fort Worth, Texas 76102

(817) 332-2500

R. Paul Yetter

State Bar No. 22154200

pyetter@yettercoleman.com

Tyler P. Young

State Bar No. 24129144

tyoung@yettercoleman.com

YETTER COLEMAN LLP

811 Main Street, Suite 4100

Houston, Texas 77002

(713) 632-8003

Cameron M. Nelson
nelsonc@gtlaw.com
GREENBERG TRAURIG LLP
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
Telephone: (312) 456-6590

Nathan J. Muyskens
nathan.muyskens@gtlaw.com
GREENBERG TRAURIG LLP
2101 L Street, N.W., Suite 1000
Washington, DC 20037
Telephone: (202) 331-3100

Bina Palnitkar
State Bar No. 24070378
palnitkarb@gtlaw.com
GREENBERG TRAURIG LLP
2200 Ross Avenue, Suite 5200
Dallas, TX 75201
Telephone: (214) 665-3600

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on September 27, 2024, I served the foregoing document electronically in accordance with the Federal Rules of Civil Procedure.

/s/ Dee J. Kelly, Jr.
Dee J. Kelly, Jr.